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September 25, 2015

Rev. Jason J. McGuire
Executive Director
New Yorkers for Constitutional Freedoms
P.O. Box 107
Spencerport, New York 14559

Dear Rev. McGuire:

On July 13, 2015, New Yorkers for Constitutional Freedoms ("NYCF") submitted an application to the Joint Commission on Public Ethics ("Commission") for an exemption from the Source of Funding disclosure requirements contained in Legislative Law Article 1-A §§1-h(c)(4), 1-j(c)(4) and 19 NYCRR Part 938. The Commission considered NYCF's application at its August 4, 2015 meeting.

The Public Integrity Reform Act of 2011 ("PIRA") (Chapter 399, Laws of 2011) amended Legislative Law Article 1-A by enacting unprecedented disclosure requirements that, through increased transparency, better inform the public about efforts to influence governmental decision-making. The Source of Funding disclosure provisions of the Legislative Law require that lobbyists who lobby on their own behalf, and clients of lobbyists who devote substantial resources to lobbying activity in New York State, make publicly available each source of funding over \$5,000 for such lobbying. The statute and the regulations permit entities to apply for exemptions from disclosure. The Client Filer must show by clear and convincing evidence that disclosure of the source will cause a substantial likelihood of harm, threats, harassment or reprisals to the source or individuals or property affiliated with the source. The purpose of these statutory provisions is to provide the public with information about those who seek to influence the government.

While NYCF has filed an application for an exemption from the source of funding disclosure requirements, the Commission notes that according to NYCF lobbying reports, NYCF has not met the expenditure threshold that triggers the referenced reporting requirements and, therefore, does not require an exemption for the 2015 January-June semi-annual reporting period.

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Consequently, the Commission has declined to consider NYCF's application for an exemption from a law to which NYCF is not currently subject. Should NYCF exceed the expenditure threshold in future filing periods, it is invited to submit a new application for exemption at that time.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Monica J. Stamm', with a stylized, flowing script.

Monica J. Stamm
General Counsel